

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**JANE DOE**, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

**DEVAL L. PATRICK**, Governor of the  
Commonwealth of Massachusetts;  
**MASSACHUSETTS DEPARTMENT OF  
CORRECTION; LUIS S. SPENCER**,  
Commissioner of the Massachusetts  
Department of Correction; and **LYNN  
BISSONNETTE**, Superintendent of the  
Massachusetts Correctional Institution at  
Framingham,

Defendants.

Civil Action No. 1:14-cv-12813

**MOTION FOR LEAVE TO SUPPLEMENT THE COMPLAINT**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Their Motion for Leave to Supplement the Complaint, Plaintiffs hereby move for leave to supplement the Complaint (Docket Entry 1) to add the allegations and claims asserted by Jane Doe 2 and Jane Doe 3 in the Proposed Supplemental Complaint.<sup>1</sup>

**CERTIFICATION WITH RESPECT TO LOCAL RULE 7.1(A)(2)**

Counsel for the Massachusetts Department of Correction, Commissioner Spencer, and Superintendent Bissonnette assent to this motion. Counsel for Governor Patrick did not respond

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<sup>1</sup> Should the Court grant Plaintiffs leave to supplement the complaint, Plaintiffs also intend to file an updated memorandum of law in support of the pending motion for class certification, which will reflect the addition of Jane Doe 2 and Jane Doe 3. A proposed updated memorandum is attached as Exhibit B to Plaintiffs' Memorandum in Support of Their Motion for Leave to Supplement the Complaint.

to communications requesting a meet and confer regarding this motion.

Dated: July 17, 2014

Respectfully submitted,

/s/ William F. Lee

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Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on July 17, 2014.

/s/ William F. Lee  
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